RIMON P.C.

Attorneys for Natt Wasserstein,
Trustee of the WB Bridge Creditor Trust
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300
David J. Mahoney
Brian Powers

Settlement Date: February 14, 2024

Time: 12:00 p.m.

Counter-proposed Orders Due: February 13, 2024 Time: 4:00 p.m.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

WB BRIDGE HOTEL LLC and 159 BROADWAY MEMBER LLC,

Case No. 20-23288 (SHL) and Case No. 20-23289 (SHL) (Jointly Administered)

Debtors.

NAT WASSERSTEIN, as TRUSTEE of the WB BRIDGE CREDITOR TRUST,

Plaintiff,

Adv. Pro. No.: 22-07059 (SHL)

-against-

11 APPLE LLC, 110 MARTENSE LLC, 135 MIDDLETON U2L LLC, 158 ROGERS NOTE ACQUISITION LLC, 159 BROADWAY LLC, 159 BROADWAY MEZZ LLC, 206 KENT INVESTOR II LLC, 206 KENT INVESTOR III LLC, 206 KENT INVESTOR LLC, 206 KENT MEZZ LLC, 251 E 61 LLC, 255 W 34 T LLC, 428 WYTHE LLC, 502 WILSON LLC, 730 LORIMER HOLDINGS II LLC, 931 CARROLL LLC, B&A MARINE CO. INC., BROOKLYN AIR CONDITIONING INC., CORNELL 46 LLC, CORNELL 159 LLC, CORNELL 245-247 LLC, CORNELL 251-247 LLC, CORNELL 251-253 LLC, CORNELL 251253 LLC, CORNELL 257 LLC, CORNELL 259 LLC, CORNELL 46 LLC, CORNELL BEDFORD HOLDINGS LLC, CORNELL BEDFORD MEMBER DE LLC, CORNELL CROWN LLC, CORNELL KEAP HOLDINGS LLC, CORNELL KENT HOLDINGS LLC, CORNELL MEEKER HOLDINGS LLC, CORNELL MESEROLE DE LLC,

CORNELL MESEROLE HOLDINGS LLC, CORNELL MYRTLE II LLC, CORNELL MYRTLE LLC, CORNELL REALTY MANAGEMENT LLC, CORNELL SCHOLES HOLDINGS LLC, CORNELL WEST 34 II LLC, CORNELL WEST 34 OWNER LLC, HAMILTON EASTMAN MEEKER HOLDINGS LLC, MERAL MEEKER LLC, N1 ACQUISITION HOLDINGS LLC, and ISAAC HAGER a/k/a ISSAC HAGER a/k/a YITZCHER HAGER a/k/a YITZCHOK HAGER a/k/a YITZCHOK R. HAGER

Defendants.

NOTICE OF SETTLEMENT OF PROPOSED ORDER

PLEASE TAKE NOTICE, that Nat Wasserstein, trustee of the WB Bridge Creditor Trust (the "Trustee"), by his counsel, Rimon P.C., in accordance with the Court's direction set forth in the Court's Memorandum of Decision dated February 5, 2024 (ECF Doc. No. 40), will settle the proposed order in the form annexed hereto as Exhibit A, authorizing and approving the motion to disqualify the law firm Leech Tishman Robinson Brog, PLLC ("LTRB") from representing certain defendants, WB Bridge Hotel LLC and 159 Broadway Member LLC (ECF Doc. No. 14) to the Honorable Sean H. Lane, United States Bankruptcy Judge for the United States Bankruptcy Court of the Southern District of New York on February 14, 2024 at 12:00 p.m. (the "Settlement Date")

PLEASE TAKE FURTHER NOTICE, that counter-proposed (red-lined) orders, if any, must be (i) electronically filed with the Bankruptcy Court, and (ii) served upon Rimon P.C., counsel to the Trustee, at 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attention: David J. Mahoney, Esq., to be received one day prior to the Settlement Date.

22-07059-shl Doc 41 Filed 02/09/24 Entered 02/09/24 14:59:36 Main Document Pg 3 of 3

PLEASE TAKE FURTHER NOTICE, that unless counter-proposed order(s) are received prior to the Settlement Date, the annexed proposed order may be signed without further notice.

Dated: Jericho, New York February 9, 2024

RIMON P.C.
Counsel to Nat Wasserstein,
Trustee of the WB Bridge Creditor Trust

s/ David J. Mahoney

David J. Mahoney Partner 100 Jericho Quadrangle, Suite 300 Jericho, New York 11753 (516) 479-6300